

Decision \_\_\_\_\_

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans.

Rulemaking 12-03-014  
(Filed March 22, 2012)

**DECISION GRANTING COMPENSATION TO CLEAN COALITION FOR  
SUBSTANTIAL CONTRIBUTION TO DECISIONS D.12-12-010 AND D.13-02-015**

<b>Claimant:</b> Clean Coalition	<b>For contribution to D.12-12-010 and D.13-02-015</b>
<b>Claimed (\$):</b> 31,608.50	<b>Awarded (\$):</b> \$34,824.30
<b>Assigned Commissioner:</b> Michel Peter Florio	<b>Assigned ALJ:</b> David M. Gamson

**PART I: PROCEDURAL ISSUES**

- A. Brief Description of Decision:** D.12-12-010 (Track 2): Adopted Standardized Planning Assumptions  
D.13-02-015 (Track 1): Adopted Local Capacity Requirements

- B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:**

	<b>Claimant</b>	<b>CPUC Verified</b>
<b>Timely filing of notice of intent to claim compensation (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	April 20, 2012	April 18, 2012
2. Other Specified Date for NOI:		May 18, 2012
3. Date NOI Filed:	*See Attachment 4, explanation of NOI	August 1, 2013
4. Was the notice of intent timely filed?		Yes, Clean Coalition's late-filed NOI was deemed

		timely.
<b>Showing of customer or customer-related status (§ 1802(b)):</b>		
5. Based on ALJ ruling issued in proceeding number:	R.10-05-006	Yes.
6. Date of ALJ ruling:	July 19, 2011	Yes.
7. Based on another CPUC determination (specify):	D.12-09-014	No.
8. Has the claimant demonstrated customer or customer-related status?		Yes, Clean Coalition demonstrated appropriate status as a customer.
<b>Showing of “significant financial hardship” (§ 1802(g)):</b>		
9. Based on ALJ ruling issued in proceeding number:	R.10-05-006	Yes.
10. Date of ALJ ruling:	July 19, 2011	Yes.
11. Based on another CPUC determination (specify):	D.12-09-014	No, the Commission’s ruling in R.10-05-006 occurred independently of any findings in D.12-09-014.
12. Has the claimant demonstrated significant financial hardship?		Yes, Clean Coalition demonstrated significant financial hardship.
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision	D.12-12-010 and D.13-02-015	Yes.
14. Date of Issuance of Final Decision:	Dec. 20, 2012 for D.12-12-010 and Feb. 13, 2013 for D. 13-02-015	Yes.
15. File date of compensation request:	February 20 <sup>th</sup> , 2013	Yes.
16. Was the request for compensation timely?		Yes, Clean Coalition timely filed the request for compensation.

**PART II: SUBSTANTIAL CONTRIBUTION**

**A. In the fields below, describe in a concise manner Claimant's contribution to the final decision** (*see* § 1802(i), § 1803(a) & D.98-04-059)

Intervenor's Claimed Contribution(s)	Specific Reference to Intervenor's Claimed Contributions	CPUC Discussion
<p><b><u>TRACK 2 (D.12-12-010)</u></b></p> <p>The Clean Coalition has been heavily involved in this iteration of the LTPP, especially in advocating for DG+IG resources<sup>1</sup>.</p> <p>All filings submitted by the Clean Coalition for Track 2 are as follows:</p> <ul style="list-style-type: none"> <li>• Clean Coalition's Reply Comments on Straw Proposal on 2012 LTPP Standards (June 11<sup>th</sup>, 2012)</li> <li>• Clean Coalition Policy Comments on Revised Proposed Scenarios in R. 12-03-014 (October 5<sup>th</sup>, 2012)</li> <li>• Clean Coalition Technical Comments (September 7<sup>th</sup>, 2012)</li> <li>• Additional Clean Coalition Technical Comments, (September 11<sup>th</sup>, 2012)</li> <li>• Clean Coalition Reply Comments on Track 2 Scenarios (October 19<sup>th</sup>, 2012)</li> <li>• Clean Coalition Opening</li> </ul>	<p>"Alliance for Nuclear Responsibility, Clean Coalition, California Cogeneration Council, CCSF, DRA, Natural Resources Defense Council, PG&amp;E, SCE, SDG&amp;E, The Utility Reform Network all indicated in their comments on the proposed decision different assumptions or scenarios they would like the Commission to examine." (D. 12-12-010 at 10)</p>	<p>Verified.</p>

<sup>1</sup> "DG+IG" (distributed generation plus intelligent grid) includes the appropriately aggressive use of distributed generation (especially wholesale) deployed in conjunction with "intelligent grid" resources, which includes demand response, energy storage, advanced inverters and monitoring communications and controls (known as MC<sup>2</sup>).

<p>Comments on Track 2 PD (December 10<sup>th</sup>, 2012)</p> <ul style="list-style-type: none"> <li>• Reply Comments of the California Environmental Justice Alliance, Sierra Club California, Union of Concerned Scientists, Clean Coalition and Community Environmental Council on the Proposed Decision on Long Term Procurement Plans and Assumptions, December 17<sup>th</sup>, 2012</li> </ul> <p>The Clean Coalition also participated in an ex parte meeting with Marcelo Poirier and participated in the LTPP scenarios workshop held at the California Public Utilities on August 13<sup>th</sup>, 2012.</p> <p>Many elements of our recommendations were included in the adopted planning assumptions, and we sought to highlight the stark differences between the Energy Division's Straw Proposal and the Proposed Decision, which we view as a result of our involvement in the proceeding. Specific recommendations include:</p>		
<p><b>Inclusion of Gov. Brown's 12,000 MW of Distributed Generation (DG)</b></p> <p>The Clean Coalition recommended that the Governor's 12,000 MW DG goal and distributed generation more generally be prioritized in this proceeding, in the following filings: Clean Coalition's Reply Comments on Straw Proposal on 2012 LTPP</p>	<p>The Commission adopted our recommendation by mentioning the Governor's goal throughout both Track 1 and Track 2 decision: "The Governor has made the adoption of distributed generation a priority. [Reference to Governor's 12,000 MW of DG goal]. This scenario was created to project the general implications of</p>	<p>Verified.</p>

Standards, June 11 <sup>th</sup> , 2012, Clean Coalition Technical Comments, September 7 <sup>th</sup> , 2012, Additional Clean Coalition Technical Comments, September 11 <sup>th</sup> , 2012, Clean Coalition Reply Comments on Track 2 Scenarios, October 19 <sup>th</sup> , 2012, Clean Coalition Opening Comments on Track 2 PD, December 10 <sup>th</sup> , 2012.	this state policy of promoting high amounts of distributed generation and demand side resources..." (D. 12-12-010 at 17).	
<p><b>Inclusion of a 40% or higher RPS scenario/sensitivity</b></p> <p>The Clean Coalition (in joint comments with the Natural Resource Defense Council, the Community Environmental Council, the Sierra Club, Union of Concerned Scientists and the California Environmental Justice Alliance) recommended that the Commission reject Southern California Edison's recommendation to remove the sensitivity that examines a higher RPS target beyond 2020. (Specific filings that advocate for a higher RPS scenario/sensitivity include: Clean Coalition's Reply Comments on Straw Proposal on 2012 LTPP Standards, June 11<sup>th</sup>, 2012, Clean Coalition Opening Comments on the Proposed Decision on the Proposed Decision on Long Term Procurement Plans and Assumptions, December 10<sup>th</sup>, 2012 and Reply Comments of the California Environmental Justice Alliance, Sierra Club California, Union of Concerned Scientists,</p>	<p>Despite utility arguments that the <i>High Distributed Generation, High Demand Side Management, 40% RPS by 2030 Sensitivity</i> be removed from the list of scenarios, the Decision opted to keep this scenario: "This scenario marks an effort to begin creating a body of analysis around the operational impacts associated with a higher RPS target beyond 2020." (D. 12-12-010 at 19).</p>	<p>Verified; but we note Clean Coalition put forth arguments that were duplicative of other parties on this issue. This demonstrates these parties failed to adequately coordinate on this issue which resulted in duplicitous efforts.<sup>2</sup></p>

<sup>2</sup> 2015 Cal. PUC LEXIS 264 (Cal. PUC 2015).

<p>Clean Coalition and Community Environmental Council on the Proposed Decision on Long Term Procurement Plans and Assumptions, December 17<sup>th</sup>, 2012. In addition, we discussed this issue in an ex parte meeting with Marcelo Poirier, Advisor to Assigned Commissioner Michel Florio on December 17<sup>th</sup>, 2012.</p>		
<p><b>High Distributed Generation, High Demand Side Management Scenario</b></p> <p>The Clean Coalition has continuously advocated for appropriately aggressive use of distributed generation in long-term planning. Specifically, the Clean Coalition stated that "...[we] also strongly support the shift in policy favoring a higher balance of distributed generation resources over large-scale centralized generation and its associated operational and capital risk impacts." (Clean Coalition Policy Comments on Revised Proposed Scenarios in R. 12-03-014, October 5, 2012 at 7).</p> <p>Additional filings that recommend inclusion of distributed generation include: Clean Coalition's Reply Comments on Straw Proposal on 2012 LTPP Standards, June 11<sup>th</sup>, 2012 and Clean Coalition Policy Comments on Revised Proposed Scenarios in R. 12-03-014, October 5<sup>th</sup>, 2012)</p>	<p>The Commission followed our recommendation by including a scenario specifically designed to look at high penetration of DG: "The [<i>High Distributed Generation, High Demand Side Management Scenario</i>] requires a change to RPS policy, moving away from central station generation by altering the procurement direction in favor of distributed generation resources." (D. 12-12-010 at 18)</p>	<p>Verified.</p>
<p><b><u>TRACK 1 (D.13-02-015)</u></b></p> <p>The Clean Coalition's primary goal for this track (as described in all</p>	<p>The Commission adopted our recommendation by requiring SCE to show full consideration of DG and other preferred resources in its</p>	<p>Verified.</p>

<p>relevant filings) was the appropriately aggressive inclusion of DG+IG resources in fulfilling local capacity requirements and increased levels of renewables. Specifically, in our Opening Comments on the Proposed Decision (January 14<sup>th</sup>, 2013), we urged “the Commission to ensure, through policy and coordinated action in other proceedings, that market mechanisms are established to develop these preferred resources to meet local capacity requirements (LCR) within the required scale and schedule.” (Clean Coalition Opening Comments on the Proposed Decision, dated January 14<sup>th</sup> at 2).</p> <p>The complete list of Clean Coalition filing contributions for Track 1 are as follows:</p> <ul style="list-style-type: none"> <li>• Clean Coalition Comments on Joint ES/LTPP Workshop topics (October 9<sup>th</sup>, 2012)</li> <li>• Clean Coalition’s Reply Brief on Track 1 Issues (October 12<sup>th</sup>, 2012)</li> <li>• Response to the Megawatt Storage Farms Motion by the Clean Coalition and the California Environmental Justice Alliance (October 22<sup>nd</sup>, 2012)</li> <li>• Reply on Joint ES/LTPP Workshop Topics (October 23<sup>rd</sup>, 2012)</li> <li>• Clean Coalition Opening</li> </ul>	<p>LCR procurement: “In its proposed procurement plan to be reviewed by Energy Division, Southern California Edison Company shall show that it has a specific plan to undertake integration of energy efficiency, demand response, energy storage and distributed generation resources in order to meet or reduce local capacity requirement needs through 2021.” (D. 13-02-015 at 133)</p>	
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<p>Comments on the Proposed Decision (January 14<sup>th</sup>, 2013)</p> <ul style="list-style-type: none"> <li>• Comments of the NRDC, Clean Coalition and the Community Environmental Council on the Proposed Decision Authorizing Long-Term Procurement for Local Capacity Requirements (January 14<sup>th</sup>, 2013)</li> <li>• Clean Coalition Reply Comments on Proposed Decision Authorizing Long-Term Procurement for Local Capacity Requirements (January 22<sup>nd</sup>, 2013)</li> </ul> <p>The Clean Coalition participated in the evidentiary hearings held in August of 2012 at the California Public Utilities Commission as well as attended ex parte meetings with the Energy Advisors for Commissioners Florio, Ferron, Peterman and Sandoval in February 2012. Lastly, we also participated in the joint Storage/LTPP workshop held at the California Public Utilities Commission on September 7<sup>th</sup>, 2012.</p>		
<p><b>Inclusion of Energy Storage in satisfying Local Capacity Requirements</b></p> <p>The Clean Coalition, in conjunction with the California Environmental Justice Alliance, filed a response to the Megawatt Storage Farms., Inc. motion to add energy storage to the top of the established Loading Order. In our joint comments (dated October 22<sup>nd</sup>, 2012), we state</p>	<p>The Commission followed our recommendation by requiring that “At least 50 MW must be procured from energy storage resources.” (D. 13-02-015 at 2).</p> <p>“We have determined that a significant amount of these resources may be available to meet or reduce LCR needs by 2021, even beyond the projections in the ISO</p>	<p>Verified; although Clean Coalition put forth arguments that were duplicative of other parties.</p>

<p>“energy storage is not only an important resource; it is an essential part of meeting our GHG goals and integrating renewables into the grid.” (Joint Comments: CEJA and Clean Coalition, dated October 22<sup>nd</sup>, 2012 at 2). In addition, in our Opening Comments and Reply Comments to the Proposed Decision, we urged the Commission to retain the 50 MW of Energy Storage procurement that was included in the Proposed Decision (which was opposed by Southern California Edison and other utilities). As we stated in our Opening Comments, this procurement target for Energy Storage was “a significant win for Energy Storage in California and the Clean Coalition is pleased to see it included in this Proposed Decision. It is our hope that the Commission and the utilities see the 50 MW as a floor, not a ceiling and proceed to procure additional ES as a preferred resource within the continuing LTPP and the coordinated ES proceeding (R.10-12-007) (Clean Coalition Opening Comments on the Proposed Decision, dated January 14<sup>th</sup>, 2013 at 3).</p>	<p>models.” (D. 13-02-015 at 133).</p>	
<p><b>Adherence to the Loading Order for all procurement</b> All of our comments (Opening and Reply Comments, joint comments with NRDC, Sierra Club California, the California Environmental Justice Alliance and the Community Environmental Council) have urged the Commission to include strict adherence to the Loading Order for</p>	<p>The Commission, based in part on our recommendations, re-affirmed its commitment to an ongoing Loading Order approach: ...”the ongoing Loading Order approach is more consistent with Commission policy [than alternatives proposed by other parties.” (D. 13-02-015 at 11).</p>	<p>Verified, although duplication occurred with other parties and the Commission would have affirmed the commitment to the Loading Order without Clean Coalition’s</p>

<p>preferred resources, consistent with the Energy Action Plan.</p> <p>In addition, The Clean Coalition (in Opening Comments on the Proposed Decision at 5) reiterated the importance of the ALJ's statement that "once procurement targets are achieved for preferred resources, the IOUs are not relieved of their duty to follow the Loading Order." We supported the Commission in ensuring that the utilities do not treat procurement targets as ceilings. This was reflected in the Final Decision.</p>	<p>"Once procurement targets are achieved for preferred resources, the IOUs are not relieved of their duty to follow the Loading Order." (D. 13-02-015 at 10)</p>	<p>comments.</p>
<p><b>Appropriately aggressive use of preferred resources to meet LCR needs, consistent with the Energy Action Plan Loading Order</b></p> <p>The Clean Coalition has been consistent in urging the Commission to continue the appropriately aggressive pursuit of preferred resources to meet the LCR needs, specifically in Southern California. We made this recommendation known in all of our comments on Track 1 LCR issues as well as in our four <i>ex parte</i> meetings with Energy advisors for Commissioners Sandoval, Florio, Peterman and Ferron (February 4<sup>th</sup>, 7<sup>th</sup> and 8<sup>th</sup>, 2013 respectively). Our direct recommendation of additional MW of preferred resource procurement levels have been included in the Final Decision in the form of the 150 additional MW of preferred resource procurement (for a total of 600 MW). <u>This was a substantial change from the PD</u> and our advocacy certainly played a role in that</p>	<p>Due in part to our advocacy, the Commission made a significant change from the PD, by including mandated procurement for preferred resources as well as for gas generation and energy storage (the PD contained no mandated procurement for preferred resources): "For the LA Basin, SCE may procure up to 600 MW of preferred resources (as opposed to an authorization of 250-450 MW in the PD), subject to the overall 1800 MW cap." (D. 13-02-015 at 118).</p> <p>"All additional resources beyond the minimum requirement must also be from preferred resources, or from energy storage resources." (D. 13-02-015 at 83).</p>	<p>Verified; although Clean Coalition put forth arguments that were duplicative of other parties.</p>

change.		
<p><b>Inclusion of Demand Response resources in modeling for LCR</b></p> <p>In all comments filed in this proceeding, the Clean Coalition has recommended that the Commission recognize Demand Response as an important resource in meeting LCR needs, especially in Southern California consistent with Commission policy and the Loading Order. Specifically, “DR should be further recognized as an importance resource in meeting LCR needs by the ISO and utilities and should be included in future modeling.” (Clean Coalition Opening Comments on Proposed Decision Authorizing Long-Term Procurement for Local Capacity Requirements, January 14<sup>th</sup>, 2013 at 2).</p> <p>The inclusion of significant Demand Response resources in the Final Decision, as an offset for projected Local Capacity Requirements and contrary to CAISO’s recommendations against (and consistent with the Loading Order) was the direct result, at least in part, of our constant advocacy for its inclusion in calculating LCR.</p>	<p>“Preferred resources include energy efficiency, demand response, and distributed generation including combined heat and power.” (D. 13-02-015 at 3).</p> <p>“No capacity from demand response was included in any ISO analysis because the ISO “does not believe that demand response can be relied upon to address local capacity needs...the ISO claims “demand response does not have these characteristics at this time.” (D. 12-03-015 at 10).</p> <p>“We agree that demand response programs are important resources in the California electricity system.” (D. 13-02-015 at 53).</p> <p>“In other proceedings, we are moving forward to promote cost-effective demand response and to integrate demand response programs as reliability resources.” (D. 13-02-015 at 55)</p>	Verified.
<p><b>Issuing an all-source RFO for LCR that does not exclude any preferred resources</b></p> <p>“We support the direction of the PD that no RFO requirements explicitly</p>	<p>The Commission adopted our recommendation: “No provisions specifically or implicitly excluding any resource from the bidding process due to resource type (except as authorized in this</p>	Verified.

<p>or implicitly exclude any preferred resources, and strongly recommend thorough application of this standard in review of RFO requirements.” (Clean Coalition Opening Comments on the Proposed Decision Authorizing Long-Term Procurement of Local Capacity Requirements, January 14<sup>th</sup>, 2013 at 11).</p> <p>As stated in our ex parte meetings and in numerous comments, the Clean Coalition supports an all-source RFO that did not implicitly or explicitly exclude any preferred resources. We believe this to be a positive inclusion in the Final Decision, and one that will create market mechanisms, use aggregated capacities and facilities as well as combine the various DG+IG resources to meet existing needs. This is a more effective way to meet these needs, rather than requiring that all services be sourced from a single facility (using gas generation qualities) to define operational characteristics.</p>	<p>Order).” (D. 13-02-015 at 132).</p>	
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**B. Duplication of Effort (§§ 1801.3(f) & 1802.5):**

	<b>Claimant</b>	<b>CPUC Verified</b>
<b>a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?<sup>3</sup></b>	<b>Y</b>	<b>Yes.</b>
<b>b. Were there other parties to the proceeding? (Y/N)</b>	<b>Y</b>	<b>Yes.</b>
<b>c. If so, provide name of other parties:</b>		

<sup>3</sup> The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

<p>For D. 12-12-010, the other parties included: Abengoa Solar, Inc.; Alliance for Nuclear Responsibility; California Cogeneration Council; California Environmental Justice Alliance; California Independent System Operator (CAISO or ISO); Center for Energy Efficiency and Renewable Technologies; City and County of San Francisco; Direct Access Customer Coalition; Distributed Energy Customer Advocates; Division of Ratepayer Advocates (DRA); Friends of the Earth; Green Power Institute; Large Scale Solar Association; L. Jan Reid; Natural Resources Defense Council and Community Environmental Council; Pacific Gas and Electric Company (PG&amp;E); San Diego Gas &amp; Electric Company (SDG&amp;E); The City and County of San Francisco (CCSF); Sierra Club and Union of Concerned Scientists; Southern California Edison Company (SCE); The Utility Reform Network; Women's Energy Matters; and Zephyr Power Transmission LLC and Pathfinder Renewable Wind Energy LLC.</p> <p>For D. 13-02-015, parties included: AES Southland (AES); Alliance for Retail Energy Markets, Direct Access Customer Coalition and Marin Energy Authority (collectively, AReM); California Cogeneration Council CCC); California Energy Storage Alliance (CESA); California Environmental Justice Alliance (CEJA); CAISO or ISO; California Large Energy Consumer's Association (CLECA); Calpine Corporation (Calpine); Center for Energy Efficiency and Renewable Technologies (CEERT); Cogeneration Association of California (CAC); Division of Ratepayer Advocates (DRA); EnerNOC, Inc. (EnerNOC); GenOn Energy, Inc. (GenOn); Independent Energy Producers Association (IEP); Natural Resources Defense Council (NRDC); Pacific Gas and Electric Company (PG&amp;E); San Diego Gas and Electric Company (SDG&amp;E); Southern California Edison Company (SCE); South San Joaquin Irrigation District (SSJID); The Utility Reform Network (TURN); The Vote Solar Initiative (Vote Solar); and Women's Energy Matters (WEM). Additional parties included: Alliance for Nuclear Responsibility (ANR); Beacon Power, LLC; City and County of San Francisco; Community Environmental Council; Distributed Energy Consumer Advocates; Ormat Technologies; and Sierra Club California (Sierra Club).</p>	
<p><b>d. Describe how you coordinated with ORA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party:</b></p> <p>The Clean Coalition's compensation in this proceeding should not be reduced for duplication of the showings of other parties. With respect to both D.12-12-010 and D. 13-02-015, the Clean Coalition took the lead in collaboration with other environmental groups, which included the California Environmental Justice Alliance, Sierra Club California, Union of</p>	<p>Verified, but <i>see</i> CPUC Disallowances and Adjustments, below.</p>

Concern Scientists, Natural Resources Defense Council and the Community Environmental Council. This collaboration led to joint comments and complementary reply comments, which essentially avoided duplication of efforts.	
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### PART III: REASONABLENESS OF REQUESTED COMPENSATION

#### General Claim of Reasonableness (§§ 1801 & 1806):

a. Intervenor's Claim of Cost Reasonableness	CPUC Verified
<p>The Clean Coalition formally intervened in R. 12-03-014 on June 4<sup>th</sup>, 2012 and has been an active party since. The Long-Term Procurement Planning Process (LTPP) is meant "to continue our efforts through integration and refinement of a comprehensive set of procurement policies, practices, and procedures underlying long-term procurement plans." With respect to D. 12-12-010 and D. 13-02-015, the Clean Coalition's efforts were directed at ensuring that the appropriately aggressive use of distributed generation alongside "intelligent grid" (collectively DG+IG) options were properly evaluated and considered in planning assumptions and to fulfill local capacity requirements (LCR).</p> <p><b>b. Reasonableness of Hours Claimed:</b></p> <p>Our efforts to ensure that DG+IG programs were included in the final decision for Tracks 1 and 2 will result in increased cost-effective and environmentally beneficial renewable energy for all ratepayers and taxpayers in California. There was essentially no duplication of efforts addressed by the Clean Coalition and other parties as we worked to ensure that only personnel essential to these matters worked on these matters. Policy Associate Dyana Delfin-Polk and Director of Economics and Policy Analysis Programs, Kenneth Sahm White took the lead in drafting comments and leading collaboration with other parties. Associate Executive Director Ted Ko provided oversight of comments and took the lead in ex parte meetings with Energy advisors and Executive Director, Craig Lewis made himself available for testimony during evidentiary hearings. We were always careful in terms of using the most appropriate personnel for each task.</p> <p><b>c. Allocation of Hours by Issue:</b></p> <p>In terms of allocation of time between issues in this proceeding, there were three overarching issues that Clean</p>	<p>Verified.</p> <p>Verified.</p> <p>Verified.</p>

Coalition focused upon: the need for the Commission to seriously evaluate and use DG+IG resources and to ensure that established State goals were met (including the Renewable Portfolio Standard, the Governor's 12,000 MW of Distributed Generation (DG) goal and strict adherence to the State's Loading Order for preferred resources), all of which are well within the scope of each track. The Clean Coalition spent the majority of time and effort on these particular issues, as is represented in the record, and in leading collaborative efforts with other groups.	
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**A. Specific Claim:\***

CLAIMED						CPUC AWARD		
ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours [A]	Rate \$	Total \$
Dyana Delfin-Polk	2012	\$75	203.2	D.11-10-040 and Res. ALJ-241	\$15,240.00	174.62	\$80.00 See D.14-12-075	\$13,969.60
Dyana Delfin-Polk	2013	\$75	37.1	D.11-10-040 and Res. ALJ-281	\$2,782.50	37.1	\$85.00 See D.14-12-075	\$ 2,707.20
	Subtotal:				\$18,022.50			\$16,676.80
EXPERT FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Craig Lewis	2012	13.8	\$170	D.11-10-040 and Res. ALJ-281	\$2,346.00	13.75	\$185.00 See D.13-12-021	\$2,543.75
Ted Ko	2012	4.15	\$145	D.11-10-040 and Res. ALJ-281	\$601.75	2.65 [1]	\$180.00 See D.13-12-023	\$477.00
Ted Ko	2013	4.75	\$155	D.11-10-040 and Res. ALJ-281	\$736.25	2.75 [2]	\$185.00 [3]	\$508.75
Sahm	2012	40.25	\$175	D.11-10-	\$7,043.75	38.375	\$280.00	\$10,745.00

White				040 and Res. ALJ-281			See D.3-12-023	
Sahm White	2013	8.25	\$185	D.11-10-040 and Res. ALJ-281	\$1,526.25	10 [4]	\$285.00 [5]	\$2,850.00
	Subtotal:				\$12,272.00			\$17,124.50
OTHER FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Ted Ko	2013	Travel: 2 hours	\$77.5	Half 2013 rate	\$155	0 [6]	92.50	\$00.00
Dyana Delfin-Polk	2013	Travel: 6 hours	\$37.5	Half 2013 rate	\$225	0 [7]	\$42.50	\$00.00
	Subtotal:				\$380.00	Subtotal:		\$00.00
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Delfin-Polk	2013	13.7	\$7.5	D.11-10-040 and Res. ALJ-281 (half rate)	\$514.00	13.7	\$42.50	\$582.25
Tam Hunt	2013	2.5	\$168	D.11-10-040 and Res. ALJ-281 (half rate)	\$420.00	2.5	\$172.50 See D.15-04-016	\$431.25
Craig Lewis	2013	.1	\$90.00	D.11-10-040 and Res. ALJ-281	18	0.1	95.00 [8]	\$9.50
	Subtotal:				\$934.00			\$1,023.00
TOTAL REQUEST \$:					31,608.50	TOTAL AWARD \$:		\$34,824.30
<p>*We remind all intervenors that Commission staff may audit its records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Claimant’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fee paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p>								

<p><b>**Approved Travel and Reasonable Claim preparation time compensated ½ of preparer's approved hourly rate.</b></p>			
<b>Attorney</b>	<b>Date Admitted to CA BAR<sup>4</sup></b>	<b>Member Number</b>	<b>Actions Affecting Eligibility</b>
Tamlyn Hunt	01/29/2002	218673	No. Hunt was, however, inactive from 01/01/2005 until 04/27/2009.

#### B. Clean Coalition's Comments

<b>Delfin-Polk</b>	D.08-04-010 (p. 9) provides for a 5% annual increase each year within each level of experience (p. 8). <b>See Attachment A for resumes for each Clean Coalition staff.</b>
<b>Lewis</b>	Lewis has 6 years' experience in the renewable energy field and over a decade of experience in the telecommunications field. Lewis is the Executive Director of the Clean Coalition.
<b>Ko</b>	Ko is the Associate Executive Director of the Clean Coalition and has five years of experience in the renewable energy field, with previous experience in the IT field.
<b>White</b>	White has 12 years of experience in the energy and clean air field and is the Clean Coalition's Policy Director.

#### C. CPUC Disallowances & Adjustments:

<b>#</b>	<b>Reason</b>
A.	Clean Coalition's position regarding Track 1, Issue 1 duplicated the position of other parties. As such 50% of the hours claimed for this issue have been removed (22.7 hours from Delfin-Polk's 2012 claim; 5.25 hours from Delfin-Polk's 2013 claim; 1.875 hours from White's 2012 claim; 0.5 hour from Ko's 2012 claim; and 0.05 hour from Lewis' 2013 claim.

<sup>4</sup> This information may be obtained at: <http://www.calbar.ca.gov>.

	<p>In addition, Clean Coalition's position regarding Track 2, Issue 3 duplicated the position of other parties. As such, 30% of the hours claimed for this issue have been removed (5.88 hours from Delfin-Polk's 2012 claim).</p> <p>The Commission notes that Clean Coalition's efforts in this proceeding duplicated the positions of other parties. But for the award of higher than requested rates, Clean Coalition's total award would have been substantially reduced.</p>
1.	Based on the timesheets submitted, only 3.15 hours were worked by Ko in 2012.
2.	Based on the timesheets submitted, Ko worked 5.75 hours in 2013. 3 of the claimed hours were for routine travel and have been removed from the award.
3.	The Commission applied to 2013 cost-of-living adjustment (2%) to Ko's 2012 rate. After rounding, Ko's 2013 rate is set at \$185.
4.	Based on the timesheets submitted, Ko worked 10 hours in 2013. The award has been adjusted.
5.	The Commission applied to 2013 cost-of-living adjustment (2%) to White's 2012 rate. After rounding, White's 2013 rate is set at \$285.
6.	The Commission does not compensate for routine travel. Ko's travel to ex parte meetings is not compensable and such hours have been removed from the award. <i>See</i> D.10-11-032.
7.	The Commission does not compensate for routine travel. Delfin-Polk's travel to the hearings is not compensable and such hours have been removed from the award. <i>See</i> D.10-11-032.
8.	<p>The Commission applied to 2013 cost-of-living adjustment (2%) to Lewis' 2012 rate. After rounding, Lewis' 2013 rate is set at \$190.</p> <p>The 0.1 hour claimed deals with intervenor compensation matters and was moved from the general claim heading to the intervenor compensation heading to be compensated at half the approved rate.</p>

#### PART IV: OPPOSITIONS AND COMMENTS

**A. Opposition: Did any party oppose the claim (Y/N)?**

No.

**B. Comment Period: Was the 30-day comment period waived (*see* Rule 14.6(2)(6)) (Y/N)?**

Yes.

#### FINDINGS OF FACT

- Clean Coalition has made a substantial contribution to Decisions (D.)12-12-020 and (D.) D.13-02-015.
- The claimed fees and costs, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.

3. The total of reasonable compensation is \$34,824.30.

**CONCLUSION OF LAW**

1. The claim, with any adjustment set forth above, satisfies all requirements of Public Utilities Code §§ 1801-1812.

**ORDER**

1. Clean Coalition is awarded \$34,824.30.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric, and Southern California Edison Company shall pay Clean Coalition their respective shares of the award, based on their California-jurisdictional electric revenues for the 2012 calendar year, to reflect the year in which the phases of the proceeding relevant to the Claim were primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month, non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning May 6, 2013, the 75th day after the filing of Clean Coalition's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.

This decision is effective today.

Dated \_\_\_\_\_ 2015, at San Francisco, California.

## APPENDIX

## Compensation Decision Summary Information

<b>Compensation Decision:</b>		<b>Modifies Decision?</b>	No
<b>Contribution Decision(s):</b>	D1212020; D1302015		
<b>Proceeding(s):</b>	R1203014		
<b>Author:</b>	ALJ Gamson		
<b>Payer(s):</b>	Pacific Gas and Electric Company, San Diego Gas & Electric, and Southern California Edison Company		

## Intervenor Information

<b>Intervenor</b>	<b>Claim Date</b>	<b>Amount Requested</b>	<b>Amount Awarded</b>	<b>Multiplier?</b>	<b>Reason Change/Disallowance</b>
Clean Coalition	2/20/2013	\$31,608.50	\$34,824.30	N/A	See Disallowances & Adjustments, above.

## Advocate Information

<b>First Name</b>	<b>Last Name</b>	<b>Type</b>	<b>Intervenor</b>	<b>Hourly Fee Requested</b>	<b>Year Hourly Fee Requested</b>	<b>Hourly Fee Adopted</b>
Dyana	Delfin-Polk	Paralegal	Clean Coalition	\$75	2012	\$80.00
Dyana	Delfin-Polk	Paralegal	Clean Coalition	\$75	2013	\$85.00
Kenneth Sahm White	White	Expert	Clean Coalition	\$175	2012	\$280.00
Kenneth Sahm White	White	Expert	Clean Coalition	\$185	2013	\$285.00
Craig	Lewis	Expert	Clean Coalition	\$170	2012	\$185.00
Craig	Lewis	Expert	Clean Coalition	\$180	2013	\$190.00
Ted	Ko	Expert	Clean Coalition	\$145	2012	\$180.00
Ted	Ko	Expert	Clean Coalition	\$155	2013	\$185.00
Tam	Hunt	Attorney	Clean Coalitions	\$336	2013	\$345.00

(END OF APPENDIX)